

1 KENNER LAW FIRM, P.C.
David E. Kenner, SBN 41425
2 Brett A. Greenfield, SBN 217343
16000 Ventura Boulevard, PH 1208
3 Encino, CA 91364
818 995 1195
4 818 475 5369 - fax

5 WADE, KELLY & SULLIVAN
733 W. 4th Avenue, Suite 200
6 Anchorage, Alaska 99501
(907) 561-7743
7 (907) 562-8977 - fax

8 Attorney for Defendant Josef F. Boehm

9 IN THE UNITED STATES DISTRICT COURT

10 DISTRICT OF ALASKA

11
12 Sally C. Purser,)
13 Plaintiff,) NOTICE OF MOTION AND MOTION FOR
14 v.) RECONSIDERATION RE: SUMMARY
15 Josef F. Boehm, Allen K.) JUDGMENT
Bolling, and Bambi Tyree,)
16 Defendants.)
17)
18)
19) CASE NO.: A05-0085 (JKS)

20 _____PLEASE TAKE NOTICE THAT ON April 4, 2006 at 8:30 AM or as soon
21 thereafter as the matter may be heard in the above-entitled Court,
22 Defendant Josef Boehm will and hereby does move this Court to
23 reconsider its order on plaintiff's motion for summary judgment.

24 This motion is made on the grounds that Defendant Boehm was
25 not given the full amount of time required to respond to the
26 affidavits of Salley Purser and Bambi Tyree. Thus, Defendant
27 Boehm, using due diligence, was not able to provide his own
28

1 affidavit in time to support his opposition to Plaintiff's motion
2 for summary judgment.

3 This motion is based upon this notice of motion and motion,
4 the accompanying memorandum of points and authorities, all
5 pleadings and papers on file in this action, and upon such other
6 evidence, argument, and matters as may be presented to the court at
7 the time of hearing.

8
9
10 DATED this 4th day of April, 2007 at Encino, California.

11
12
13 KENNER LAW FIRM

14
15 By: _____/s/_____
16 David E. Kenner
17 California 41425
18 16000 Ventura Blvd.
19 Penthouse 1208
20 Encino, California 91436
21 Telephone: (818) 995-1195

22 By: _____/s/_____
23 Brett A. Greenfield
24 California 217343
25 16000 Ventura Blvd.
26 Penthouse 1208
27 Encino, California 91436
28 Telephone (818) 995-1195